



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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June 18, 2008

Keith A. Davis, Treasurer
National Republican Congressional Committee
320 First Street
Washington, DC 20003

Response Due Date:
July 21, 2008

Identification Number: C00075820

Reference: April Monthly Report (3/1/08 – 3/31/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. Schedule E discloses independent expenditures on behalf of a federal candidate(s) participating in the 2008 Special General election for the congressional seat in the 14th district of Illinois. Schedule F of this report discloses coordinated expenditures on behalf of candidate(s) participating in the same election. Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate; and that is not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate's authorized committee, or their agents, or a political party committee or its agents.

Further, 11 CFR §109.21 outlines the factors which define a coordinated communication. Please verify that the independent expenditures made by your Committee in support of James Oberweis and in opposition to Bill Foster meet the definition of and were properly categorized as independent expenditures. If necessary, amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page) or coordinated

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expenditures (Schedule F supporting Line 25 of the Detailed Summary Page).

If the reclassification of these expenditures as in-kind contributions results in excessive contributions, the Commission recommends that you notify the candidate(s) and request a refund of the amount in excess of \$5,000 per election. If the reclassification of these expenditures as coordinated expenditures results in your committee exceeding the limitations under 2 U.S.C. §441a(d), the Commission recommends that you notify the candidate(s) and request a refund of the amount in excess of the expenditure limitation.

Please inform the Commission of any corrective action immediately in writing and provide a photocopy of your refund request(s) sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

2. Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$7,090.50 from "Smart Media Group" and \$10,397.03 from "Ceridian Tax Service;" however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary.

3. Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the **full name**, mailing address, **occupation** and **name of employer**. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

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Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

4. The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each inadequately identified entry (see attached).

5. Your report shows refunds of apparent independent expenditures on Schedule A supporting Line 15. Please amend Line 15 by providing the following additional information: the name, office sought, state and congressional district (if applicable) of the federal candidate, as well as the election designation and date made of the original independent expenditure.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to

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taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,



Laura E. Sinram
Senior Campaign Finance Analyst
Reports Analysis Division

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Inadequate Occupation and Employer Entries

Occupation	Employer
Adminstrator Nonprofit	F
Attorney	HFMPC
Businessman	Ewa
Businessman	Self
Business Owner	Self
Business Owner	Self Employed
CEO	Jsa
CEO	Self
CEO	Store
Chairman	I S R
Chm Of The Board	T X U
Consultant	Self
Consulting	Self
Manager	Self
Mangement	Self
Marketing Exec	Self
Owner	Cis
Owner	Owner
Owner	Self
Owner	Self Employed
Phtsician	Self-employed
Physician	Fed. Govt.
President	Cpss
President	Mwr.
President	Self
President / CEO	Mrci
President/Owner	Self
Principal	DR. Shaun McKee
Professor	Dtcc
Rt	Rt.
Sales Executive	CPA
Secertaryu	Self
Self	Self
Self - Employed	Ae Data
Self - Employed	Allred Bros.
Self - Employed	Bouris Ranches

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Inadequate Occupation and Employer Entries (Continued)

Occupation	Employer
Self-Employed	Regal Investments Inc.
Self - Employed	Self
Self Employed	Adult Cardiovascular Consultants Pa
Self Employed	Artist, Kanell Lontos
Self Employed	Birch Construction
Self Employed	Digital By Design
Self Employed	Dr. William A Hall
Self Employed	Glaucoma Tech
Self Employed	Lyssa
Self Employed	Mc Kinley Trucking
Self Employed	Richard Burns
Self Employed	The Bedwell Company
Service	Rio Marine Inc.
Various	Stebbins Aviation Inc.
Vice Chair	Ccf

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